

**MILBANK, TWEED, HADLEY & MCCLOY LLP**

**28 LIBERTY STREET**

**NEW YORK, NY 10005-1413**

212-530-5000

FAX: 212-530-5219

Alan J. Stone

Partner

DIRECT DIAL NUMBER

212-530-5285

FAX: 212-822-5285

E-MAIL: astone@milbank.com

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**LOS ANGELES**

213-892-4000

FAX: 213-629-5063

**WASHINGTON, D.C.**

202-835-7500

FAX: 202-835-7586

**LONDON**

44-20-7615-3000

FAX: 44-20-7615-3100

**FRANKFURT**

49-69-71914-3400

FAX: 49-69-71914-3500

**MUNICH**

49-89-25559-3600

FAX: 49-89-25559-3700

**BELJING**

8610-5969-2700

FAX: 8610-5969-2707

**HONG KONG**

852-2971-4888

FAX: 852-2840-0792

**SEOUL**

822-6137-2600

FAX: 822-6137-2626

**SINGAPORE**

65-6428-2400

FAX: 65-6428-2500

**TOKYO**

813-5410-2801

FAX: 813-5410-2891

**SÃO PAULO**

55-11-3927-7700

FAX: 55-11-3927-7777

July 20, 2018

**VIA ECF AND FAX (212-805-7942)**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Daniel Patrick Moynihan United States Court House  
500 Pearl Street  
New York, NY 10007-1312

Re: VEREIT, Inc. v. Schorsch, et al. (1:17-cv-06546-AKH)

Dear Judge Hellerstein:

We represent Plaintiff VEREIT, Inc. ("VEREIT") in the captioned action. We write to request: (i) an adjournment of the status conference currently scheduled for July 23, 2018 at 11:00 a.m., which the Court scheduled to resolve VEREIT's motion for clarification dated July 18, 2018 ("Motion for Clarification") (Dkt. No. 57); and (ii) an extension of the discovery deadlines set in the Court's July 12, 2018 order deciding Defendants' motion to compel ("Order on the Mot. to Compel") (Dkt. No. 56).

An adjournment is necessary due to a scheduling conflict of the undersigned counsel for VEREIT. Specifically, I will be visiting a prisoner I am representing in a pro bono case in Louisiana. This is our first request for an adjournment of this status conference. We have conferred with counsel for Defendants, who have informed us that they have no objection to an adjournment. The parties can be available for a rescheduled status conference on July 24, if that day is convenient for the Court. Due to other scheduling conflicts, the parties are not available on any day next week other than July 24, but are available the following week on July 31, the morning of August 1, and the afternoon of August 3.

The status conf. will be held  
on July 24, 2018 @ 12:00 p.m.

So Ordered.

7/20/2018

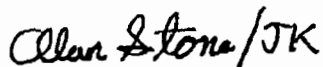
Al K. Hellerstein

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Due to the issues raised in the Motion for Clarification, the parties agree that an extension of the discovery deadlines set in the Order on the Motion to Compel—July 25 for supplemental responses to interrogatories and August 3 for all jurisdictional discovery, including depositions—is necessary. The parties suggest determining a revised discovery schedule at the next status conference. In any event, in an effort to ensure compliance with the Order on the Motion to Compel, VEREIT will provide supplemental responses to the interrogatories identified therein by the original deadline, July 25, except for Interrogatory No. 16, which is the subject of VEREIT's Motion for Clarification and at issue in the upcoming status conference.

We thank the Court for its consideration of this request.

Respectfully submitted,

Handwritten signature of Alan J. Stone in black ink, followed by the initials JK.

Alan J. Stone

cc: All counsel (*via ECF*)